UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 12 1999

RECEIVED
MAR 16 1999
HAZARDOUS WASTE ENFORCEMENT DIVISION

Mr. Richard Johnson, Chief
Hazardous Waste Enforcement and Compliance Division
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

RE: U.S. EPA Region III, 839 Bestgate Road, Annapolis, MD 21401
HW ID No. MDD981741929

Dear Mr. Johnson:

We are providing you notification that as of February 28, 1999, we are no longer generating hazardous waste from the EPA Region III laboratory facility, located at 839 Bestgate Road, Annapolis, Maryland. The EPA Bestgate Road facility was a facility leased by the General Services Administration that EPA Region III has vacated as a result of our move to a new laboratory facility at Fort Meade, Maryland. The new facility at Fort Meade (EPA Environmental Science Center) has been assigned a new MDE hazardous waste identification number. EPA Region III no longer occupies the 839 Bestgate Road facility.

We are requesting that EPA Region III be removed as a hazardous waste generator under Hazardous Waste ID Number MDD981741929, for the 839 Bestgate Road facility as of February 28, 1999.

If you have any questions or require any additional information, please contact Rick Dreisch at (410)305-2646, or Skip Weisberg at (410)305-2681.

Sincerely,

James W. Newsom

James W. Newsom
Acting Assistant Regional Administrator
for Policy and Management

cc: Rick Dreisch, EPA/Region III
Skip Weisberg, EPA/Region III
Bucky Green, EPA/HQ
Doug Dooling, GSA

Gen

INSPECTION REPORT

LCR

EPA Central Regional Laboratory
839 Bestgate Road
Annapolis, MD 21401
MDD981741929

Date of inspection: 6/3/92 Date of report 6/4/92

I. Purpose:

The purpose of this inspection is to determine compliance with State and Federal regulations regarding the generation, storage, and disposal of hazardous wastes. Compliance Evaluation, Land Disposal Restrictions, TCLP, and Waste Minimization inspections were conducted at this facility.

II. Representatives present:

Norman Fritsche, Environmental Scientist, Environmental Protection Agency, Central Regional Laboratory

Denise A. Bygler, Inspector, MD Dept. of the Environment

III. Owner/Operator:

This facility is owned and operated by U.S. EPA

IV. Facility Description:

This environmental testing laboratory is located off of Bestgate Road in Annapolis MD in Anne Arundel County, and is housed in a brick building nearly surrounded by chain-link fencing.

V. Non-hazardous Waste Streams:

Non-hazardous wastes generated include waste paper, plastic, sewage, various lab supplies, and lab samples. All samples are held on-site until analyses are completed and a hazardous waste determination has been made. Waste stream may also include waste chemicals which are disposed of after a hazardous waste determination has been made.

VI. Hazardous Waste Generation:

Hazardous wastes are generated in many areas as follows:

-Oxygen Demand Lab; BOD, COD, TOC, and Nutrient analysis is done here. Wastes from these processes contains some level of mercury. This waste is accumulated in 2-1/2 gal. containers, marked as required.

-Nutrients Room; TKN and TP analysis is performed here. Sample waste (containing sulfuric acid and 200ppm mercury) is accumulated in 3-gal. containers. Also generated here is PO4 waste, accumulated in quart containers. Containers marked as required.

-GCMS Lab 2; Volatile and semi-volatile analysis takes place here. Very small quantities of DOO2 waste is generated here.

-Microbiology Lab; Total and fecal coliform tests are done here. Waste from these processes is handled as special medical waste, and disposed of through METLAB.
-Organic Lab; Methylene Chloride is generated here. An experimental project is going on throughout this lab involving the recapture of fumes from the fume hoods. Recaptured methylene chloride is being stored in 1-gal. jugs until a market is found.
-GC Rooms (2); PCB and pesticide analysis takes place here. Hazardous wastes generated here is accumulated in properly marked 1-gal. containers.
-Extraction Room; Waste hexane and methylene chloride are generated here; for recovery.
-Metals Processing Room; Waste generated here is a nitric acid glassware wash accumulated in small containers, marked as required.
-Metals Room 2; TCLP analyses are done here on samples generated from in-house as well as off-site. Hazardous wastes generated here is a washwater accumulated in a 3-gal. container; properly marked.

VII. Hazardous Waste Management:

A) 90-day area- Hazardous wastes are stored inside s concrete building. This building is marked and bermed as required. Wastes presently in storage include:
-375 ml. Chromium waste 12ppm, dated 5/13/92
-16 oz. Metals, PCB<50ppm, dated 5/13/92
-2 oz. Sludge (Pb, Hg, Cr) dated 5/8/92
-3.5 oz. FOO2 waste dated 5/7/92
-75g. PCB w/lead dated 5/22/92
-240 ml. PCB in oil dated 4/10/92
-2 lbs. sampling waste (gloves,etc.) dated 4/10/92
-2 gal. PCB in hexane >50ppm. dated 5/9/92
-PCB in hexane, 20ppm. dated 5/21/92
-PCB in soil < 50ppm dated 5/13/92
-1-55 gal. drum approx. 1/3 full of DOO2,D009 waste dated 4/2/92
All containers are properly marked and closed during storage.

VIII. Recordkeeping:

A. Annual Reports- on-site and submitted to the Dept. as required. All information appears correct and complete.

B. Manifests-retained on-site inexcess of 5 years. Waste is transported by ECOFLO to their facility located in N.C. Information on manifests appears correct and complete. LDR notifications accompany each manifest as required. Manifest

documents indicate varying amounts of waste generated, many in excess of 1,000Kg.

C. Contingency Plan/Emergency Procedures review- Document located on-site meets requirements, though no copy has been forwarded to the State. A copy was received by this inspector, according to Mr. Fritsche, copies have been forwarded to local agencies as required.

D. Personnel Training records- are maintained on-site in employee files. Training is conducted as required.

IX. Other Observations/Notes- Mr. Fritsche maintains extensive records on-site regarding wastes generated,inspections of waste storage area, and other information.

X. Violations: None

XI. Enforcement Action: Not Necessary

XII. Schedule of Compliance: Not Necessary

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224
CENTRAL-REGIONAL LAB

Sequence #

Report of Observations

Type of Inspection/Observations: RCRA Gen Date 2/4/92

Facility Name: EPA Central Regional Laboratory

Remarks: 839 Bestgate Rd.
Annapolis, MD 21401 59
MDD981741929

Upon discussion of one outstanding violation - that violation being waste on site in excess of 90 days - Mr. Fritsche told me that he is going to place the Silvex (2 containers - 30g. + 3g) and the ~~Chlorom~~ Chloroethylvinylether (20ml.) back into the lab. These materials were originally received as Standard Samples in a kit of samples.

Mr. Fritsche originally placed these in waste storage because he thought the lab could not use them, but in retrospect decides that it may.

Telephone conversation 2/4/92 9:00 am.

Observer: [signature] Person Interviewed:

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

CASE # _____

Report of Observations

Type of Inspection/Observation : RCRA Date 9/10/91

Facility Name : EPA Central Regional Laboratory

Remarks :

Oxygen Demand Lab - BOD, COD, TOC and nutrient analysis is done here. Wastes from these processes contains some level of mercury. This waste is accumulated in 2½ gal. containers, then consolidated into 55 gal. drums in storage. The containers are reused. Satellite accumulation containers are marked as required.

Nutrients room - TKN and TP analysis is performed here. Sample waste (containing Sulfuric acid and 200ppm mercury) is accumulated in 3 gal. containers. Also generated here is PCB waste accumulated in Quart containers. Some non-regulated waste is generated here as well as wash water. The pH of the wash water is monitored, and records are kept to that effect.

Sample Logging Area - no waste is generated here. Samples are checked-in and stored here until analyses is complete.

GCMS Lab 2 - Volatile and semi-volatile analysis takes place here. Very small quantities of D002 sample waste is generated.

Microbiology Lab - total and fecal coliform tests are done here. Waste from this area is packaged as special medical waste and shipped via MetLab according to Mr. Fritsche.

Organic Lab - Methylene Chloride is generated here. An experimental project is going on throughout the lab involving the recapture of Methylene Chloride from fume hoods in all labs. Fumes are recaptured, rather than letting them pass out into the atmosphere. Central is trying to locate a market for this product. Approx 12-1 gal jugs are being stored here.

GC Rooms (2) - PCB and pesticide analyses take place here. Hazardous waste generated here is accumulated in 1 Gal. containers.

Organic Extraction Rooms - extraction of constituents takes place here. No regulated wastes are generated here.

TIME IN : **TIME OUT :**

Observer : _____ Person Interviewed : _____

MDE 111
REV. 1/11/88

POLLUTION REDUCTION COMPLIANCE REPORT

Generator: E.P.A. Central Regional Lab
Date: 9/10/91

Address: 839 Bestgate Rd.
Annapolis, MD 21401

EPA ID No.: MDD981741929

County: A.A.

MDE Inspector: Bygler

Contact Person: Norman Fritsche
Telephone: (301) 266-9180

Please describe Briefly the CHS generating operation:

Wastes generated through laboratory procedures, and environmental samples

The waste generated is:

(a) Recovered or recycled on-site ___ off-site ✓
(b) Treated on-site ___ off-site ✓ (c) Disposed of ✓ .

Please explain briefly any recovery or treatment possibilities which were considered to further reduce the volume of or the hazard that the CHS poses to the environment according to the Environment Title 7-205 of the Annotated Code of Maryland. Please indicate any efforts made in this regard.

Using smaller sample sizes so less becomes waste

EVALUATION BY MDE's POLLUTION PREVENTION STAFF.

Did the generator demonstrate to your satisfaction that recovery possibilities have been considered and the CHS volume and toxicity cannot be reasonably reduced further?

Yes ___ No ___

Recommended action:

Staff signature ..... date .....

Supervisor ..... date .....

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(301) 631-3400

FI _____ Inspector: _____ Date: _____

GENERATOR CHECKLIST

Facility Name: _____

Address: _____

Facility Representative: _____ Telephone No.: _____

Description of Work Activity: _____

EPA Identification Number? _____

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?..... ✓ Yes ___ No
   If yes, under which catagory is the waste?

   ✓ Ignitable ✓ Corrosive ___ Reactive ✓ EP Toxic ✓ RCRA Listed

2. Describe the amount of waste generated (day, week or month).

   _____

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?..... ✓ Yes ___ No
   (If no, do not complete sections B and C)
2. Does generator use manifest?..... ✓ Yes ___ No
   If no, explain: _____
3. Does generator retain copies of manifests?..... ✓ Yes ___ No ___ N/A
   If yes, does the manifest include the following information?
   (26.13.03.04C)
   - -Manifest document number?..... ✓ Yes ___ No ___ N/A
   - -Generator's name, mailing address and telephone number?..... ✓ Yes ___ No ___ N/A
   - -Generator's EPA I.D. number?..... ✓ Yes ___ No ___ N/A
   - -Transporter name(s) and EPA I.D. number(s)?..... ✓ Yes ___ No ___ N/A
   - -Designated TSDF name, address, and EPA I.D. number?..... ✓ Yes ___ No ___ N/A
   - -Alternate TSDF name, address, and EPA I.D. number?..... ___ Yes ✓ No ___ N/A
   - -Instructions to return waste to generator if undeliverable?..... ___ Yes ✓ No ___ N/A
   - -Description of the waste required by DOT regulations?..... ✓ Yes ___ No ___ N/A

-Quantity of each hazardous waste by units of weight or volume?....✓Yes___No___N/A
-Total number and types of containers given to transporter?.....✓Yes___No___N/A
-Is the proper certification noted on each manifest?.....✓Yes___No___N/A

4. Has the generator signed and dated manifests (26.13.03.04E)?.....✓Yes___No___N/A
5. Did the generator obtain initial transporter's signature and date of acceptance?.....✓Yes___No___N/A
6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?.....✓Yes___No___N/A
7. Have manifests been retained for three years?.....✓Yes___No___N/A

Section C - Pre-Transport Requirements (26.13.03.05) ___N/A

1. Does generator package wastes in accordance with DOT requirements?....✓Yes___No
2. Are containers in good condition?.....✓Yes___No
   If no, explain:_____
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?.....✓Yes___No
4. Is period of accumulation less than 90 days?.....___Yes✓No
   -If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....✓Yes___No___N/A
   -If no, explain:_____
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....✓Yes___No___N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....✓Yes___No___N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
   -Manifests and signed copies from designated facilities?.....✓Yes___No
   -Annual Reports?.....✓Yes___No
   -Exception Reports?.....___Yes___No✓N/A
   -Waste Analyses?.....✓Yes___No___N/A

Section E - Special Conditions (26.13.03.07)

1. Has the generator received from or transported to a foreign country any hazardous waste(s)?.....___Yes✓No
   -If yes, has a notice been filed with MDE and EPA?.....___Yes___No___N/A
   -Is this waste manifested and signed by a foreign consignee?.....___Yes___No___N/A
   -If generator transported wastes out of the country, has confirmation of delivery been received?.....___Yes___No___N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?.....✓Yes___No
   If yes, do they include:
   -Job title and written job description of each position?.....✓Yes___No
   -Description of type and amount of training?.....✓Yes___No
   -Records of training given to facility personnel?.....✓Yes___No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?.....___Yes✓No

2. Is the facility equipped with:
   a. Internal communication or alarm system?..... ✓ Yes ___ No
   b. Telephone or two-way radio to call emergency response personnel?..... ✓ Yes ___ No
   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?..... ✓ Yes ___ No
   d. Water of adequate volume for hoses, sprinklers, or water spray system?..... ✓ Yes ___ No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?..... ✓ Yes ___ No
4. Has the owner/operator made arragements with the local authorities to familiarize them with characteristics of the facility?..... ✓ Yes ___ No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?..... ___ Yes ✓ No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?..... ___ Yes ___ No ✓ N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?..... ✓ Yes ___ No
   If yes, does contingency plan include:
   -Arrangements with local emergency response organizations?..... ✓ Yes ___ No
   -Emergency coordinators' names, phone numbers, and addresses?..... ✓ Yes ___ No
   -List of all emergency equipment at the facility and description of equipment?..... ✓ Yes ___ No
   -Evacuation plan for facility personnel?..... ✓ Yes ___ No
2. Is there an emergency coordinator on site or on call at all times?..... ✓ Yes ___ No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?..... ✓ Yes ___ No
4. Has the plan ever been implemented?..... ___ Yes ✓ No
   -If so, was the plan appropriate?..... ___ Yes ___ No ___ N/A
   If the plan was <u>not</u> appropriate, has it been amended?..... ___ Yes ___ No ___ N/A
   -If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?..... ___ Yes ___ No ___ N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?..... ✓ Yes ___ No
2. Is container made of a material that will not react with the waste which it stores?..... ✓ Yes ___ No ___ N/A
3. Are containers always closed when holding hazardous waste?..... ✓ Yes ___ No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?... ✓ Yes ___ No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?..... ✓ Yes ___ No
6. Do container storage areas have adequate containment systems?..... ✓ Yes ___ No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?..... ✓ Yes ___ No ___ N/A
8. Are incompatible wastes or materials placed in the same containers?... ___ Yes ✓ No ___ N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?..... ___ Yes ___ No ✓ N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?..... ✓ Yes ___ No ___ N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?.....✓ Yes ___ No
   If yes, do reports contain the following information?
   a) Name, address and EPA I.D. number of facility?.....✓ Yes ___ No
   b) Date and year covered by report?.....✓ Yes ___ No
   c) Description/quantity of hazardous waste?.....✓ Yes ___ No
   d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?.....✓ Yes ___ No
   e) Certification signed by owner/operator?.....✓ Yes ___ No

Section G - Other Checklists Completed: ___ N/A

_____ Tanks
_____ Transporter
___✓___ Land Disposal Restrictions
_____ TSD Facility
_____ Surface Impoundment
_____ Waste Pile
_____ Land Treatment
_____ Landfill
_____ Incinerator
_____ Thermal Treatment
_____ Groundwater Monitoring

Section H - Additional Comments

The Central Regional Laboratory, part of the Environmental Protection Agency (EPA Region 3), tests environmental samples such as water and soil for several government programs such as NPDES, Superfund, and others. This laboratory is located at 839 Bestgate Rd., Annapolis, MD., Anne Arundel County.

The purpose of this inspection is to determine compliance with State and Federal regulations regarding the generation, storage and disposal of hazardous wastes. Upon entering the Central Regional Lab I met with Mr. Norman Fritsche, Environmental Scientist, who accompanied me throughout this inspection.

A tour of the facility took us through many different labs and areas detailed as follows:

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

CASE # _____

Report of Observations

Type of Inspection/Observation : RCRA Date 9/10/91

Facility Name : EPA Central Regional Laboratory

Remarks :

Oxygen Demand Lab - BOD, COD, TOC and solvent analysis is done here. Wastes from these processes contains some level of mercury. This waste is accumulated in 2½ gal. containers, then consolidated into 55 gal. drums in storage. The containers are vessed. Full & accumulation containers are marked as required.

Nutrients room - TKN and TP analysis is performed here. Sample waste (containing Sulfuric acid and 200ppm mercury) is accumulated in 3 gal. containers. Also generated here is PCB waste accumulated in Quart containers. Some non-regulated waste is generated here as well as wash water. The pH of the wash water is monitored, and records are kept to that effect.

Sample Logging Area - no waste is generated here. Samples are checked-in and stored here until analysis is complete.

GCMS Lab 2 - Volatile and semi-volatile analysis takes place here. Very small quantities of DOT sample waste is generated.

Microbiology Lab - total and fecal coliform tests are done here. Waste from this area is packaged as special medical waste and shipped via Metlab according to Mr. Fritsche.

Organic Lab - Methylene Chloride is generated here. An experimental project is going on throughout the lab involving the recapture of Methylene Chloride from fumehoods in all labs. Fumes are recaptured, rather than letting them pass out into the atmosphere. Central is trying to locate a market for this product. Approx 12-1 gal jugs are being stored here.

GC Rooms (2) - PCB and pesticide analyses take place here. Hazardous waste generated here is accumulated in 1 Gal. containers.

Organic Extraction Rooms - extraction of constituents takes place here. No regulated wastes are generated here.

TIME IN : **TIME OUT :**

Observer : _____ Person Interviewed : _____

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

CASE # _____

Report of Observations

Type of Inspection/Observation : RCRA Date 7/10/91

Facility Name : Central Regional Lab Annex.

Remarks :

Storage Room - Samples for QA Audits stored here.
Robotics Room - Robot sample analysis takes place here. No wastes generated in this area.
Balance Room - This vaulted room contains various measuring devices. No wastes is generated here.
Mass Spec Room - no waste is generated here.
Extraction Room - waste hexane and methylene chloride are generated here, for recovery.
Metals Processing Room - Waste generated here is nitric acid glassware wash accumulated in small containers, marked as required.
Muffle Furnace Room - No waste generated here.
Mass Spec Room 2 - no waste generated here.
Metals Room 2 - TCLP analyses are done here on samples generated from outside as well as inside the lab. Hazardous waste generated here is a wash water accumulated in a 5 gal. container, properly marked.

Hazardous Waste Storage Area - Hazardous wastes are stored inside a concrete building. This building is marked and bermed as required. Wastes presently stored are as follows:
1-55 gal. drum approx. 1/2 full of Organic sample waste (F002) dated 8-21-91
1-55 gal. drum approx 1/2 full of Metals waste (D002) dated 8/14/91
11-1 gallon containers of Methylene Chloride (all dated) for consolidation into a 55 gal drum for shipment.
1. ~~Gal~~ container Potassium cyanide (100g.) dated 7/12/91
1- 2 gal. container NO_2 + NO_3 (D002, D006) dated 9/10/91
1. 2 gal. container Nitric Acid Metals Waste (D002, D001, D006-10) dated 9/10/91

TIME IN : **TIME OUT :**

Observer : _____ Person Interviewed : _____

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA Date 9/10/91

Facility Name: Central Regional Lab cont'd.

Remarks:

Several Containers located in the storage area have been stored in excess of 90 days. These are:

1- 2 gal. container Cyanide Standard waste dated 4/1/91

1-1 gal. container Cyanide dated 11/5/90.

According to Mr. Fritsche, the hauler would not pick these up during ~~the~~ the previous shipment because the hauler would have mixed wastes on his truck.

Also:

Silvex (D017)-30g. solid, 5mb. liquid dated 2/28/90

Trichlorophenol (F027) - 20g. dated 2/28/90

Silvex (D017) - 3g. dated 2/28/90

~~Chlorovinyl~~

Chloroethylvinylester (U042) 20ml. dated 5/24/88

Trichlorophenol and Dimethyl phenol 30g. dated 4/21/88

2,4,5 T acid (pesticide) - 10ml.

Environmental pesticide soil samples - (6) DDE, DDT, Chlordane, 2100g. dated 2/20/91

According to Mr. Fritsche, an EPA-approved facility has not been located for these wastes.

Also stored here is 4 gal. Pesticides in hexane contaminated with PCB 750, <500 dated 5/13/91.

Located in a separate storage area is:

+ 55 gal. approx 1/3 full, TKN-TP process waste with mercury and Sulfuric acid (D002, D009) dated 7/30/91

5 gal. mercury waste dated 8/10/91. This storage area is also bermed, located in the same building described above.

Inspection of on-site records revealed that Central retains all manifest documents in excess of 5 years. Waste is transported by ECOFLO to ECOFLO facility located in North Carolina. Information on manifest documents appears correct, all required information is contained within.

Observer: Person Interviewed:

MDE 111
REV. 1/11/88

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA Date 9/10/91

Facility Name: Central Labs cont'd.

Remarks:

LQG notification accompanies manifest documents, information appears correct. Manifest documents indicate varying amounts of waste generated, many shipments in excess of 1,000 kg.

Personnel Training records are kept onsite in employee files as required. Contingency plan exists for Central, though no copy has been forwarded to the State. I received a copy today, the plan appears to satisfy requirements.

Mr. Fritsche maintains detailed records regarding wastes generated, inspections of waste area, and other information.

X

Instructions to Central Regional Labs regarding compliance w/ RCRA regulations is as follows:

- Three steps to find certified hauler and facility for wastes stored on site in excess of 90 days. Phone Emily Troyer at (631-3343) for list of certified haulers or other information needed.

Observer: [signature] Person Interviewed: Norman E. Fuhrke 9/25/91

MDE 111
REV. 1/11/88

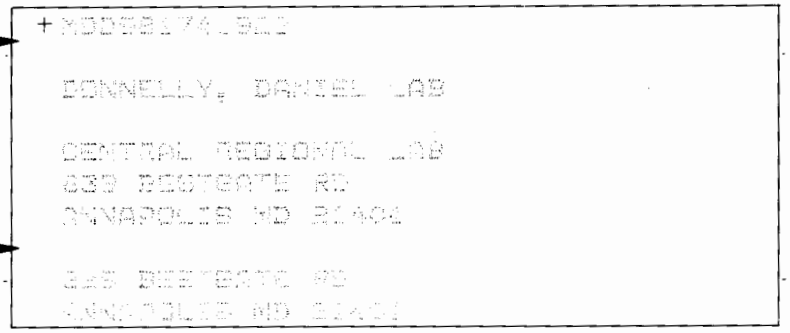
EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

INSTALLATION ADDRESS



EPA Form 8700-12B (4-80)

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments: C C

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)	
C F MDD981741929 T/A C 1		86/10/21	003 Anne Arundel

I. Name of Installation

CENTRAL REGIONAL LABORATORY

II. Installation Mailing Address

Street or P.O. Box: C 3 839 BESTGATE ROAD

City or Town	State	ZIP Code
C 4 ANNAPOLIS	MD	21401

III. Location of Installation

Street or Route Number: C 5 839 BESTGATE ROAD

City or Town	State	ZIP Code
C 6 ANNAPOLIS	MD	21401

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
C 2 DONNELLY DANIEL LAB	3012242740

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
C R USEPA	

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: MDP0000007 82

ID — For Official Use Only							
C						T/A	C
W	98-174-1929						1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 2	F 0 0 3	D 0 0 1	D 0 0 2	D 0 0 4	D 0 0 5
7	8	9	10	11	12
D 0 0 6	D 0 0 7	D 0 0 8	D 0 0 9	U 1 8 8	M 0 0 1

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40* CFR *Parts 261.21 — 261.24)*

[X] 1. Ignitable *(D001)* [X] 2. Corrosive *(D002)* [X] 3. Reactive *(D003)* [X] 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Daniel K Donnelly	Daniel K. Donnelly, Chief Annapolis Laboratory Section	9/29/86

EPA Form 8700-12 (Rev. 11-85) Reverse

RECEIVED

OCT 1 1986

Hazardous Waste Division